

Normative Regulation of Internal Communication within the Government Bodies in the Republic of Macedonia

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Abstract

Internal communication is essential for the efficient functioning of the institutions in the system. The positioning of internal communication at an appropriate level in accordance with the needs of the employees for completion of their work activities and tasks is a prerequisite for successful and timely completion of the activities, and at the same time for a higher level of functioning of external communication.

The paper focuses on internal communication in the bodies of state administration in the Republic of Macedonia, in terms of its normative regulation of horizontal and vertical level. The purpose of the paper is to identify organizational and normative gaps in defining the horizontal and vertical communication within the administrative bodies in the country. The survey, which covered 15 ministries in the Republic of Macedonia, consists of the analysis of the responses received by the ministries in terms of the existence of bylaws regulating the internal exchange of information.

The results of the received answers showed that no ministry in the Republic of Macedonia has adopted normative acts or regulations governing internal exchange of information - horizontally or vertically.

Key words: *Internal communication, normative acts, forms, shapes, exchange of information.*

Introduction

The essence of communication is (an) exchange of information. In this regard most of the definitions of communication range in its explanation as "an activity of transferring information", "information process usually through a common system of symbols", "successful transmission of information through a common system of symbols, signs, behavior, speech, writing, or signals", "exchange of information between two points", "process of exchange of information and ideas, or an active process which includes encoding, transmission and decoding

of the received message"; "effective transfer of information and expression of thoughts and facts"¹.

Concerning the flows of communication, the organizational communication theory divides them into: communication flows within the organization (internal communication) and communication flows to / from the environment (external communication). In addition, internal communication is defined as communication among the people that the organization consists of, among the departments within an organization or between the management and the employees. Regarding the definitions of communication, a high placement of internal communication is extremely important for regular, timely and accurate transmission of information within an organization / institution. Especially since, in terms of internal activities, no part of the institution – the departments and the units – can function separately, and their systematic networking through the communication flows of information is a prerequisite for complete effective institutional functioning and fulfillment of the assigned activities and tasks in the area the institution is responsible for. In addition, the legislatives that treat the issue of communicating with citizens and keeping them informed about the activities of the institution are of great importance, which is a prerequisite for increasing the participation of the citizens in the decision making process for different social issues that reflect on their everyday lives. Appropriate and timely response to the needs of the citizens is another reason an implemented system of communication and exchange of information is necessary within the institutions.

1. Legal basis for informing

In accordance with the legal regulation in the Republic of Macedonia, the work of the state administration bodies is based on the principles of independence, legality and accountability, as well as on the principles of efficiency, cost effectiveness, transparency, equality and predictability (Article 3 of the Law on the Organization and Operation of the State Administration Bodies). The state administration bodies, within the scope of their competencies, are obliged to ensure efficient and lawful exercise of the citizens' constitutional freedoms and rights and to inform the public for their work in accordance with the Constitution and law, unless the information about their work are related to the national security, are official or business secret or in case the information is considered personal data of the citizens in accordance with the law that regulates the protection of personal data of citizens (article 4 and article 9) .

¹http://www.google.com/search?hl=en&defl=en&q=define:communication&sa=X&oi=glossary_definition&ct=title
<http://www.merriam-webster.com/dictionary/communication>
<http://www.thefreedictionary.com/communication>

The legal regulation emphasizes the principles of legality and transparency of the work of public administration. According to article 9 of the Law on Organization and Operation of Administration Bodies, the state administrative bodies are obligated “to inform the public for their work in accordance with the Constitution and law“, and to “perform their competencies established by law on the basis of the principles of legality, accountability, efficiency, cost effectiveness, transparency, equality and predictability “ (article 3).

The Law on Civil Servants (consolidated text), from 2010, in article 21 states: „The civil servant shall, in accordance with law, be obliged to provide information upon request of the citizens required for exercise of their rights and interests, except the information referred to in Article 20² of this Law“.

The Law on Local Self-Government from 2002, in article 8 precisely enumerates the obligations of the municipal bodies, committees of councils and public services established by the municipality to inform citizens about their work without compensation, as well as about plans and programs that are important for the development of the municipality. At the same time the municipality is obliged to allow citizens access to basic information about the services they provide, in a manner and under conditions determined by statute.

The free access to information, the freedom of reception and transmission of information is guaranteed by the Constitution of the Republic of Macedonia (article 16). To fully implement this constitutional provision, the Macedonian Parliament in January 2006 adopted the Law on Free Access to Public Information, which defines the procedures for exercising of this right.

The Law on Free Access to Public Information underlines the obligation of institutions to provide information with precise deadlines. This law ensures transparency in the operations of holders of information and enables individuals and legal entities to exercise their right of free access to public information, and the holders of information are obliged to provide information about their work to the public.

For proper implementation of the Law on Free Access to Public Information, which includes following the legal deadlines and timely submission of the required information, a well developed internal system of information exchange within the institutions themselves is necessary.

As confirmation that the low level of development of such a system proves to be an obstacle in the implementation of the above mentioned law is the fact that during the training of the officials on free access to public information (which in the period 2008-2009 was organized by the Commission for free access to public information, and during which the author of this paper participated as a trainer) a

² **Article 20**

(1) The civil servant shall be obliged to keep a state secret and an official secret in a manner and under conditions stipulated by law and other regulation.

(2) The obligation for keeping an official secret shall be valid for a period of three years after the termination of the service.

series of complaints were made by officials that if the requested information is not within their unit or department it is much more difficult to receive it from another unit or department.

In this regard, as an obstacle to obtain the required information, the officials in training indicated the subjective conduct of some of the superiors, who believed that they "should not share information with employees, much less allow them to be given to the public," even if the information was not classified in the appropriate degree of protection under the Law on Classified Information and the Regulations that derive from it.

2. Normative regulation

The system of communication and exchange of information within the institutions should not be left alone, and a situation in which information is withheld because of various subjective and objective reasons should not be allowed. This reflects on the internal functionality of the institution and on the external communication and transparency. Especially today when good communication and exchange of information with the public aims to present the state institution as transparent in terms of its operations, the system "cannot and must not" be allowed to become lethargic or to exchange information "when found necessary". This means that it is necessary to implement rules and procedures for the exchange of information within the institution.

Internal communication in this paper is treated in terms of information exchange, i.e. flow and sharing of information on a particular area and activity (which the institution is responsible for), within the institution (internally), which has an impact on the flow and sharing of information with the service users of an institution, i.e. external communication.

Normative regulation on the manner and form of information sharing on horizontal and vertical levels, during which frequency is especially significant, or an implemented system of regularity of exchange of information (holding meetings among units and departments, general meetings within the ministry, distribution of minutes of general meetings and other meetings, as well as meetings within the departments, are some of the main forms of exchange of information) indisputably imposes a significant institutional precondition that will set the framework for monitoring and observing certain established rules.

In order to perceive the current situation of normative regulation of internal communication in the ministries of the Republic of Macedonia, in the period 2009 - 2010 a research was conducted, which included 15 ministries in the country. To 14³

³ Ministry of Defense, Ministry of Interior, Ministry of Justice, Ministry of Foreign Affairs, Ministry of Labour and Social Policy, Ministry of Finance, Ministry of Education, Ministry of Economy, Ministry of Agriculture, Forestry and Water Management, Ministry of Transport and Communications, Ministry of Health, Ministry of Culture, Ministry of Local Self-Government, Ministry of Environment and Physical planning, Ministry of Information Society and Administration.

of the ministries in the country a request was submitted in accordance with the Law on Free Access to Public Information, with which the following was requested: "By-laws / regulations governing internal exchange of information (horizontal – between departments - and vertical), and a rulebook for holding a general meeting". The answers related to this question were obtained from the Ministry of Education and Science through a questionnaire sent to 50 civil servants from which 31 were on managerial positions and 19 were advisors.

3. Analysis of the received answers

In order to receive the complete picture, hereinafter the answers from the ministries in the Republic of Macedonia are separately classified and analyzed.

The *Ministry of Defense* responded that "The Ministry does not have By-laws / regulations governing internal exchange of information (horizontal – between departments - and vertical), or a rulebook for holding a general meeting".

The *Ministry of Environment and Physical Planning* has Rules for organization of the workplaces, which in article 27 and 28 defines the work of the organizational forms. In addition to the reply the following excerpt from the rulebook was delivered:

"Systemic and other complex and important issues within the scope of the competencies of the Ministry are reviewed on a staff meeting held between the Minister and senior government officials and executives of the bodies within the ministry, or civil servants entrusted with reviewing, studying and preparation of expert opinion that is reviewed on a meeting. The staff meeting shall be convened by the Minister on his/her own initiative or on the initiative of a senior civil authority and head of a body.

The work of the staff meeting is managed by the minister.

The heads of the bodies within the ministry also take part in the work of the staff meeting.

Within the body that is part of the ministry, the meeting is convened and managed by the head of the body".

The Rulebook of this Ministry also includes the following „within each department the head of the department can convene a work meeting once per week, for more efficient coordination of the work within the department, as well as harmonization of opinions on certain matters that derive from everyday work activities". However, the formulation „can" once again indicates that holding a work meeting is not compulsory.

In the *Ministry of Health* "bylaws that regulate internal exchange of information within the Ministry of Health have not been adopted." The ministry notes that there is an established procedure for exchanging information between departments and agencies under the Ministry of Health and it includes exchanging information in writing via internal delivery book and electronically (official email), and holding staff meetings, attended by the Minister of health, Deputy Minister of health or the Secretary General, heads of departments and directors of bodies. It is

questionable how the established procedure will comply in the future with the arrival of a new minister in charge of the institution. This is primarily due to the present practice of frequently changing the established procedures, even more so if the change in ministers is the result of a complete change of the ruling party.

The *Ministry of Local Self - Government* answered that they have not yet adopted by laws governing the exchange of information at the horizontal level – between departments and vertical or a rulebook to convene a staff meeting. Their response included the following explanation "Given the relatively small number of employees, thirty-four, by now the exchange of information took place on the basis of hierarchy, in accordance with the Law on Civil Servants. Due to the need for implementation of the Law on Public Internal Financial Control, the Ministry of Local Government in the following period will commence the preparation of bylaws to define the procedures for internal operations. "

The *Ministry of Foreign Affairs* also has no rules for internal exchange of information or, in this context, bylaws. "The transfer of information is regulated by the current legislation of the Republic of Macedonia, i.e. in accordance with the Law on Classified Information and Regulation on administrative security of classified information" - said the response from this institution.

It is further explained that with the Law for Foreign Affairs the rights and competencies of the Ministry of Foreign Affairs are most specifically defined, i.e. this law regulates:

- The manner and procedure for executing external affairs by the state administrative bodies;
- The competencies of the state government and the state administrative bodies in the creation, establishment and implementation of foreign policy;
- Competence, organization and operation of the Ministry of Foreign Affairs of the Republic of Macedonia;
- The type and procedure for opening a diplomatic and consular missions of other states in the country and the rights, duties and responsibilities of the diplomatic and consular officials in the Ministry of Foreign Affairs and the diplomatic and consular missions of the Republic of Macedonia.

"Issues regarding foreign affairs of the Republic of Macedonia that are not regulated with this law are regulated by other bylaws of the Republic, by treaties, other international acts that bind the Republic of Macedonia and by the usual rules applicable in international law" – states the response from the MFA.

The *Ministry of Economy* replied that the Ministry has not adopted a specific bylaw that would regulate these issues: internal exchange of information (horizontal – between departments and vertical) in the Ministry of Economy, as well as a rulebook for holding staff meetings. "For this purpose, the Ministry of Economy is applying the Law on Organization and Operation of the State Administration Bodies, the Regulation for the organization of the Ministry of Economy, as well as direct instructions from the Minister of Economy."

In the short response from the *Ministry of Transport and Communications* it is stated that: „The Ministry of Transport and Communications does not have

rulebooks or bylaws regulating the exchange of information, as well as a rulebook for holding work meetings.”

The *Ministry of Finance* refers to the Regulation on principles for internal organization of state administration bodies (Official Gazette no. 105/07), in which, among other principles from article 2 of the stated Regulation, are the principle for uniformity and hierarchical organization of the organizational units and the principle of intersectoral and interdepartmental coordination.

In the same Regulation in article 3 it is stated that the internal organization of the body is managed by bylaws for internal organization, and the following is listed as being governed by bylaws:

- The type and number of organizational units in the body,
- The scope of work of the organizational units, their responsibilities and mutual relations and
- Manner and form of management (staff meetings, councils etc.) and their competencies and responsibilities.

In accordance with this Regulation, the Ministry of Finance emphasizes that it has adopted a Rulebook for organization and work of the Ministry of Finance no 01-14172/1 from 31.03.2008, and it considers that in this rulebook there is a response to the request of “By-laws / regulations governing internal exchange of information (horizontal – between departments - and vertical), and a rulebook for holding a general meeting”.

After reviewing the stated Rulebook it can be concluded that it consists of a description of the organizational forms of the Ministry, the scope of work of the organizational forms, i.e. this Rulebook, as well as (with slight differences) almost identical ones in the other ministries in the Republic of Macedonia, is not a bylaw that regulates the internal exchange of information. In the Rulebook of this Ministry in article 24 the manner in which a meeting is convened is stated, more specifically it is emphasized that:

- The Minister convenes an expert staff meeting as an advisory body.
- The participants in the expert staff meeting consider general and other matters within the scope of the Ministry and gives opinions and proposals to the Minister.
- The participant in the expert staff meeting are: the Minister, Deputy Minister, Secretary General, state advisors, heads of departments and directors of the Ministry of Finance.
- In the work of the expert staff meeting other civil servants invited by the Minister may participate
- The minister decides the need of convening a staff meeting and the issues that will be considered.

It is obvious that this ministry also lacks a regulation for convening a staff meeting, indicating the mandatory convening of a meeting, with a timetable (weekly, twice a month, etc.), and there is no discussion whatsoever on keeping meeting minutes and their distribution to the employees. If a staff meeting is going to be held or not completely depends on the minister, which leaves room for

irregular organizing of this essential form of meetings that keep the management structures within the institution informed.

The *Ministry of Agriculture, Forestry and Water Management* gave a similar response as the Ministry of Finance, citing the Rules of systematization of job positions, in which, according to the Ministry, "for every single job position cooperation of each agent within the department is planned, and cooperation between the heads of departments for the purpose of exchanging information, cooperation in the field in which they operate, as well as harmonization of opinions between departments or units."

In addition to the response, the Rules of the systematization of job positions was submitted, stating that "in it the communication - horizontal and vertical can be seen."

The cited part of the Rule is the following:

Purpose of the job position: the Head of Department develops and unites policies within the department for coordination and technical assistance to the Office of the Minister, organizes, directs and coordinates the work of the department by controlling the programs and managing the funds and supports the work of the secretary, or the head of the body where a secretary is not appointed.

Work duties:

- manages the department, organizes, unifies and directs the work of the department;
- performs the most complex tasks, performs direct control and supervision over the execution of the work;
- allocates the work and tasks to the heads of units, gives instructions and the needed professional help in the preparation of materials;
- is responsible for the tidiness and efficiency in the work of the department and prepares concepts for improving the organization and functionality of the offices
- monitors the execution of the work;
- is responsible for timely, legal and quality execution of tasks and duties within the scope of the department;
- directly works on the most complex tasks in the sector;
- is responsible for the current correspondence;
- proposes opinions on principal systemic issues;
- participates in the work of government bodies;
- organizes and maintains cooperation with other agencies in the ministry and beyond;
- is responsible for training and discipline of the employees;
- analyzes, assesses and reassesses emerging issues.

In regard to the written above, it can be said that the Rule cannot be considered a bylaw that regulates the internal exchange of information, i.e. it does not mention any kind of information exchange between the Head of Department and

the subordinates in the department, because the organization, unification, direction, allocation of tasks and etc., does not include exchange of information - top-down and vice versa bottom-up - and does not mention any exchange of information at the horizontal level, with other heads of departments. The Rule does not specify holding regular weekly meetings, departmental, between departments, between units and within the units themselves. This assumes a situation in which some employees may be called and receive working tasks, and the others may not be informed about the work of the unit or department.

The work of the staff in this ministry is governed by the Regulation on organization and operation of the Ministry, Article 37 and 38. In the stated article it says:

- For efficient operation and full exercise of the duties and tasks, the Minister constitutes an executive body. The executive body is composed of the Minister, Deputy Minister, Secretary and senior civil servants.
- Depending on the issues under consideration, expert civil servants may participate in the work of the executive body if they have been directly involved by cooperating on specific issues and materials discussed at the meeting.
- The executive body shall be convened and managed by the Minister, and in the event of his/her absence or inability, it is managed by the Deputy Minister or Secretary General.
- The organization of the executive body is responsibility of the Head of the Cabinet of the Minister.
- The executive body considers important issues for implementation of the Programme of Work and conclusions of the Parliament and Government proposals for the adoption of laws, drafts, draft laws and other regulations and general acts, analyzes, reports, information, programs and other materials .

However, here also the time of convening an executive meeting is not stated, its regularity, i.e. its compulsory convening, as well as the management and distribution of meeting minutes.

The *Ministry of Interior* did not give a precise answer whether or not it has adopted by-laws or regulations governing the internal exchange of information on horizontal and vertical level. Referring to the legal regulations that govern the work of the ministry in its reply said:

"The employees of the Ministry of Interior in cases when it comes to public information or information which contains classified or personal data, then the exchange of information contained in these data is handled in accordance with the laws and regulations for the subject areas, no matter if the exchange of information is conducted horizontally or vertically. This means that the ministry fully complies with the applicable laws and regulations relating to the protection of personal data, classified information or public information. "

Regarding the organizational structure and the relationships between the employees of the Ministry of Interior, the Ministry stated that it is in accordance with the Law on Police ("Official Gazette" of RM, No. 114/06), Law on Internal Affairs ("Official Gazette" of RM, No. 19 / 95, 55/97, 38/02, 33/03, 19/04, 51/05 and 84/08), Code of Police Ethics ("Official Gazette" of RM No. 72/07) and Guidelines for the conduct and interrelationships of police officers ("Official Gazette" of RM No. 65/07).

As to the request for a bylaw that regulates the convening of staff meetings, the Ministry of Interior answered that "provisions with similar content can be found in the Regulation on organization and operation of MI, however this bylaw has a degree classification 'strictly confidential'."

In the mentioned Guidelines for the conduct and interrelationships of police officers in Chapter III, the relations between the police officers are regulated. Among other things, there is the manner of filing requirements, applications, responding to them, issuance of written or verbal orders, reporting to the superior etc.

Considering that this is a specific body whose activities and manner of organization and action are primarily confidential and strictly confidential⁴, it cannot be compared to other ministries regarding the subject matter of this paper. Moreover, it is a ministry which not only functions under the regulations related to the area of his jurisdiction, it also operates in accordance with its own strict and specific internal rules and regulations.

Of all the ministries only the *Ministry of Labor and Social Policy* has adopted a Guideline on conducting communication with the public. In its response to the submitted request the Ministry informed that "the bylaws and regulations governing the exchange of information are covered in the Guideline on the method of conducting communication with the public."

Although the Guideline applies to external communication, i.e. the way of communicating with the media, its adoption (April 2008) is of great importance because it regulates the internal communication in terms of delivering information to those responsible for public relations.

Namely, in the Guideline, in the part regarding internal organization, in Article 5 it is stated:

"The departments in the Ministry and bodies within the ministry submit the information in written and electronic form to the unit of public relations and information.

⁴ According to the Regulation of storing and protecting documents, reports, data and other laws in MI from 14.09.2007 as state secrets are considered part of the data, reports, documents, actions, including data on the organization and systematization of the Ministry, or "documents, data or other acts or actions that are being prepared or taken into the Ministry of Interior for which the Minister will decide that they constitute state secret"

The departments in the Ministry and bodies within have at least one civil servant who is responsible for delivering the information to the unit of public relations and information.

Approval for providing data and other information to the public that is in the scope of the work of the Ministry and the bodies within the Ministry is given by the Minister and the head of the unit of public relations and information. "

Furthermore, the Guideline regulates the competencies of the Minister, the head of the unit of public relations and information, and other civil servants in terms of communication with the media, the availability of the head of the unit of public relations and information and other authorized persons in the Ministry, where it is emphasized that "in case the head of the unit for public relations and information is unable to, communications with the media is conducted by an authorized civil servant in the Ministry," and that "in case of new developments or emergency the head of the unit or the authorized civil servant are available 24 hours for communication with the media. " Regarding the manner of conducting communication of the Ministry with the public, the following are included: briefings, conferences, media interviews, campaigns, publications, newsletters and other professional literature.

The existence of this Guideline, although it only partially regulates the internal exchange of information between the unit for public relations and other units, departments and bodies, it is crucial for the successful practice of public relations, for timely delivering of information to the responsible persons for public information, for accuracy and coordination.

Regarding the existence of a Rulebook for convening general meetings, in this ministry such an act does not exist, but convening a meeting is covered in Articles 27, 28, 29 of the Regulation for the internal organization of the Ministry of Labor and Social Policy, which states that the Fundamental and strategic issues within the competence of the Ministry and its bodies, are considered in a staff meeting attended by the Minister, deputy Minister, Secretary General, state advisors and heads of departments, heads of bodies.

"The work of the staff meeting is managed by the Minister or on his behalf by his/her deputy or the secretary general. Meetings of the staff shall be convened by the Minister or Secretary General, they are held once a week or when found necessary, and it can be attended by civil servants who participated in the preparation of the material under consideration at the meeting. "

Although keeping meeting minutes and their distribution is lacking, only the Regulation on the internal organization of the Ministry points out a period date for the staff meetings, however adding the part 'when found necessary' can be interpreted that they do not have to be held once a week.

The *Ministry of Justice* refers to the Law on Organization and Operation of the state administration, according to which it has adopted a Regulation on internal organization.

“In chapter five – *Manner of operation* (in Articles 22 to 25) and in Chapter Six - *Work meetings* (in Articles 26 and 27) there are provisions that regulate the way of communication in the Ministry” - said in a response from the Ministry of Justice. The indicated articles, including Article 24, which states that “senior officials in the organizational forms maintain mutual cooperation while performing tasks and duties within their scope of operation”, does not regulate the manner and form of internal exchange of information, does not define the forms of mutual cooperation, since they are general formulations that suggest planning tasks and duties, the duty of civil servants to conscientiously carry out their tasks in accordance with the regulations (Article 22⁵, 23⁶), and the ability to form working groups if joint work of civil servants is required (Article 25⁷).

The use of the term “work meetings” in chapter six refers to the importance of maintaining work meetings, however in Article 26 of this part of the Regulation only states that “system and other complex and important issues are addressed in the work meeting attended by the Minister of Justice, deputy Minister of Justice, Secretary General, state advisors, heads of departments and directors of bodies” and that “the work meetings may be attended by other civil servants involved in the processing of certain issues,” and in Article 27⁸ only the right of the heads of departments and units to convene meetings of subordinate civil servants is highlighted, which does not mean such meetings are compulsory, nor regularity of their convening, which would give the subordinate structures an opportunity to be regularly informed about the activities of the unit and department.

The response of the Ministry of Informatics (in 2011 renamed the Ministry of Information Society and Administration), due to their relatively short period of existence at the time of the survey, states that “they are currently in the process of

⁵ Article 22: “The activities and tasks in the Ministry are planned and organized for effective and efficient realization of work plans in the organizational forms, which are contained in the Annual Work Programme of the Ministry”

⁶ Article 23: “Civil servants that work in the Ministry are obligated to perform their duties and tasks consciously, professionally, impartially, efficiently, orderly and timely in accordance with the Constitution of the Republic of Macedonia, the laws, regulations and other bylaws and within the limitations of received orders and instructions, to show initiative in their work and to form their expertise opinions and suggestions on the basis of expert knowledge and their own observations ”

⁷ Article 25: “The activities and tasks that require special study or have special expert preparation that can not be provided within the organizational forms, i.e. the performance of which requires joint work of civil servants can be performed through specially educated groups. The composition of the working groups and members appointed by the Minister or Director within the body. ”

⁸ “Within the organizational forms, managerial workers can convene work meetings with civil servants for more effective coordination of activities and harmonization of views and expert opinions on certain issues arising from the work.”

forming units, among which is the unit that will respond to these requirements and will manage the public information" and that they are working on establishing the standard necessary regulations.

From the response received from the *Ministry of Culture* it can be concluded that this ministry has no bylaws to regulate the internal communication. Regarding the existence of a rulebook for convening staff meetings, this ministry clearly states that such a rulebook has not been adopted. In addition they state that "in practice each week the Minister convenes a regular staff meeting with the heads of departments, and every two days meetings between departments and the cabinet", which again is not a framework that assumes compulsory holding of general and staff meetings.

In the survey conducted in the *Ministry of Education and Science*, when asked the question "Are there normative acts regulating the exchange of information between department heads and unit heads?" almost all respondents answered negatively. There are no regulations or any normative acts that regulate internal communication on horizontal and vertical level, according to the received answers from the archives and legal services. The obligation of cooperation can only be drawn from the section devoted to the description of the tasks and duties of the heads of departments and heads of units in the Rulebook on systematization of job positions, where, among other things, for the head of department it is stated that he/she shall "cooperate with government advisors and heads of departments in the ministry," and for the head of the unit that he/she shall "directly cooperate with other heads of units in the department, as well as with the assistant head of the department on issues within the scope of the department."

Also, the Rulebook for organization of the Ministry from 2008 states that "within each department, the head of the department can once a week convene a work meeting for the purpose of more effectively coordinating the activities in the department and harmonization of the opinions on certain issues arising from the work." However, in practice, according to the answers of the participants, the exchange of information depends largely from the daily need of information from another department or unit.

According to the given answers it can be concluded that part of the ministries in their responses refer to the regulations for systematization of job positions as bylaws in which "in every single position cooperation of each agent within the department is planned, and cooperation between the heads of departments for the purpose of exchanging information, cooperation in the field in which they operate, as well as harmonization of opinions between departments or units." However, it is a form that is present in every regulation for organization of the job positions, and which does not require accurate, timely and regular exchange of information with the purpose of effective and efficient execution of work tasks.

What is also surprising is the fact that the ministries do not even have adopted rulebooks for convening work meetings, i.e. from the received answers it can be concluded that they all try to respond by referring to the Law on Organization and Operation of the State Administration, the regulations for internal

organization or the regulations on organization of job positions, in which the holding of meetings is treated in regard of who can attend and who can convene a meeting. However, these rulebooks the regularity of holding a meeting is not mentioned, only that it is convened by the "minister on his/her own initiative" or that the "Minister decides the need of convening an expert staff meeting and the issues to be discussed", which anticipates a situation in which convening a general meeting is a result of a subjective assessment. Also, keeping meeting minutes and their distribution to the employees of the institution is not mentioned.

Conclusion

From the conducted research it can be concluded that none of the ministries in the country have adopted bylaws or rulebooks regulating the internal communication. This indicates that within the administrative bodies very little or no attention is paid to internal communication / information sharing as one of the key factors for successful management of the organization. The lack of regulations for convening staff and work meetings, i.e. the lack of regulation for the holding of general meetings within the ministry, among departments, among units and staff meetings within departments as one of the main forms of information exchange, only serves to confirm this.

The existing regulations on for systematization of job positions and organization of the ministries are without clear and precise provisions regarding this issue, because "maintaining mutual cooperation" and convening staff and work meetings "when found necessary" does not necessarily imply compulsory, nor does it imply regular information and coordination for effective execution of activities in the unit, department, ministry.

To ensure the utmost transparency of ministries and for them to function as a system in which the parts that it consists of have established a high level of communication, it is necessary to have legislation that regulates the exchange of information within the institution: Amendment of existing legislation on the organization and work of the state administration bodies with a clear and precise article that will be legally binding to adopt a bylaw - rulebook governing internal communication within the ministries or adopting a regulation on the principles of internal communication in the state administration bodies.

Employees must and should be informed of the activities of the institution in which they work! Their information level should not be reduced to the subjective will of superiors to transfer information. General meetings within the Ministry must be convened regularly; meeting minutes should be made public and posted on the bulletin board or distributed electronically to the employees.

The Rulebook should regulate the exchange of information on horizontal level between heads of units and heads of departments, to define the time, manner and form of exchange of information; the source of information; to establish some

form of information exchange, such as the establishing regular staff/ work meetings between units and between departments, and to define the frequency of their convening.

The transparency that the ministries are bound to according to Article 3 of the Law on Organization and Operation of the State Administration Bodies (from 2000) should be proven primarily within the institution, which will ultimately reflect on greater transparency towards citizens, because the internal public will be liberated from the pressures of secrecy, i.e. disclosing information that is subjectively considered to be secret, even though they are not classified as such.

In this case, internal communication for receiving or giving information will not occur "when found necessary", which can always be individually evaluated differently by the one requesting and one that giving information, and an internal communication system will function, in which everyone will know when, where and how to obtain information that will contribute to much more informed employees about the activities of the ministry. Of course, the Rulebook should regulate the meeting convening within the department as well, so that the civil servants that are hierarchically on a lower level, some of which are expert staff that usually executes the most complex tasks, are kept informed and therefore can feel like part of the system.

The need for this is intensified at a time when reforms that are implemented by an institution seek active involvement of all organizational forms and when the exchange of information between departments and within departments with employees is established as an important prerequisite for successful and coordinated implementation of planned activities.

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